

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SANDRA K. LONG, a single individual,

Plaintiff,

v.

USAA CASUALTY INSURANCE  
COMPANY, DOES I-X,

Defendants.

No. 2:19-cv-00568 RSL

STIPULATED JOINT MOTION AND  
ORDER FOR CONTINUANCE OF  
DISCOVERY DEADLINE

**I. STIPULATION**

COME NOW Plaintiff Sandra K. Long and Defendant USAA Casualty Insurance Company (“USAA”), by and through their counsel of record, and hereby make this stipulated joint motion that the discovery cutoff deadline be continued from April 5, 2020 to June 30, 2020. No other deadlines shall be impacted by this continuation of the discovery cutoff.

The Court may modify the discovery cutoff deadline “for good cause.” LCR 16(b)(4). Good cause exists here. First, the parties have been working cooperatively to schedule the depositions of two corporate witnesses located in San Antonio, Texas. The parties have finally been able to coordinate the schedules of counsel and the witnesses and set these depositions for April 8 and 9, 2020—after the discovery cutoff. Second, the coronavirus pandemic has presented

1 additional and unexpected challenges to the parties' ability to complete discovery by April 5,  
 2 2020. For instance, the parties are working to schedule Plaintiff's deposition and had initially set  
 3 her deposition for March 19, 2020. However, Plaintiff is at a higher risk for complications arising  
 4 from COVID-19 and is taking necessary precautions of self-isolation to avoid contracting the  
 5 coronavirus. Similarly, government and public health officials have ordered individuals in this  
 6 state and across the country to practice social distancing and/or self-isolate to slow the spread of  
 7 the coronavirus. Holding additional depositions during this pandemic may put counsel, the  
 8 parties, witnesses, and court reporters at unnecessary risk for contracting and/or spreading the  
 9 coronavirus.

10 For the foregoing reasons, the parties agree to and request a continuance of the discovery  
 11 deadline from April 5, 2020 to June 30, 2020. This continuance will not affect any other deadlines  
 12 and will allow the parties to complete discovery well ahead of the August 3, 2020 trial date.

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STIPULATED JOINT MOTION AND ORDER FOR  
 CONTINUANCE OF DISCOVERY DEADLINE – 2

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II. ORDER

IT IS SO ORDERED that, for good cause shown, the parties may extend the discovery cutoff deadline to June 30, 2020. All other court deadlines provided in the December 5, 2019 Amended Order Setting Trial Date and Related Dates shall remain in effect and unchanged.

DATED: March 19, 2020



HONORABLE ROBERT S. LASNIK  
United States District Court Judge

Presented by:

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STIPULATED JOINT MOTION AND ORDER FOR  
CONTINUANCE OF DISCOVERY DEADLINE – 3

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